## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CRIMINAL PRODUCTIONS, INC.,

RODUCTIONS, INC

Docket. No. 2:17-cv-3375

v.

REBECCA RODRIGUEZ,

**Defendants** 

**Plaintiff** 

MOTION FOR ENTRY OF DEFAULT JUDGMENT

Pursuant to Rule 55(b)(2), Plaintiff hereby moves the Court for entry of default judgment against Defendant REBECCA RODRIGUEZ, for her failure to plead or otherwise respond to Plaintiff's Complaint; and to award statutory damages, injunctive relief, attorney's fees, and costs.

Respectfully submitted,

/s/ Charles Thomas, Jr.
CHARLES THOMAS, ESQUIRE
Atty. I.D. 89781
CThomas@lmhlaw.com

/s/ Lee M. Herman LEE M. HERMAN, ESQUIRE Atty. I.D. 27570 lmh@lmhlaw.com

CREATIVE RIGHTS LAW GROUP, PLLC Attorneys for Plaintiff 280 Providence Rd. Suite 4 Media, PA 19063 (t)610-891-6500 (f) (215) 689-1930

DATED November 28, 2017